

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



RYAN KARNOSKI, *et al.*,

Plaintiffs, and

STATE OF WASHINGTON,

Plaintiff-Intervenor,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States,
et al.,

Defendants.

Misc. No. 1:20mc13

Underlying Action: Case No. 2:17-
cv-01297-MJP (W.D. Wash.)

**DEFENDANTS' MOTION TO QUASH THIRD-PARTY SUBPOENA ISSUED TO
WILLIAM F. MORAN, FORMER VICE CHIEF OF NAVAL OPERATIONS**

Pursuant to Rules 26(c)(1) and 45(d)(3) of the Federal Rules of Civil Procedure, Defendants in the above-captioned action respectfully move to quash a third-party subpoena ordering William F. Moran, the former Vice Chief of Naval Operations, to appear for a deposition on May 28, 2020 in this District, and for other and further relief as the Court deems just and proper.

The grounds for this motion are set forth in the accompanying memorandum of points and authorities in support of the motion, as well as the declaration of William F. Moran, and other exhibits attached hereto. A proposed order is also submitted herewith.

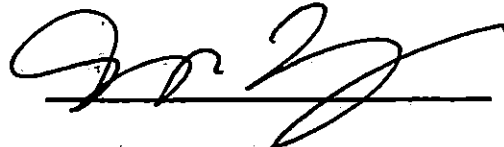
Dated: May 14, 2020

Respectfully submitted,

JOSEPH H. HUNT
Assistant Attorney General
Civil Division

ALEXANDER K. HAAS
Director, Federal Programs Branch

ANTHONY J. COPPOLINO
Deputy Director, Federal Programs
Branch

A handwritten signature in black ink, appearing to read 'Grace X. Zhou', is written over a horizontal line.

GRACE X. ZHOU
(N.Y. Bar No. 5623681)
CHRISTOPHER D. EDELMAN
ANDREW E. CARMICHAEL
Trial Attorneys
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L Street, NW
Washington, DC 20005
Tel: (202) 616-8267
Email: grace.x.zhou@usdoj.gov

Counsel for Defendants

CERTIFICATE OF CONFERRAL

Pursuant to Local Rule 37.1, I hereby certify that undersigned counsel met and conferred telephonically on May 11, 2020 with Jordan Heinz and Chalia Stallings-Ala'ilima, counsel of record for Plaintiffs and Plaintiff-Intervenor in the underlying action, in a good faith effort to resolve this dispute, but were unable to do so. The parties have also corresponded in writing regarding this issue. During the May 11 meet-and-confer, counsel for Plaintiffs and Plaintiff-Intervenor agreed to stay the compliance date of the subpoena pending this Court's resolution of the instant motion to quash.

Dated: May 14, 2020

Respectfully submitted,

JOSEPH H. HUNT
Assistant Attorney General
Civil Division

ALEXANDER K. HAAS
Director, Federal Programs Branch

ANTHONY J. COPPOLINO
Deputy Director, Federal Programs
Branch

A handwritten signature in black ink, appearing to be 'Grace X. Zhou', written over a horizontal line.

GRACE X. ZHOU
(N.Y. Bar No. 5623681)
CHRISTOPHER D. EDELMAN
ANDREW E. CARMICHAEL
Trial Attorneys
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L Street, NW
Washington, DC 20005
Tel: (202) 616-8267
Email: grace.x.zhou@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on May 14, 2020, a copy of the document above was served by email to the following counsel of record for Plaintiffs and Plaintiff-Intervenor in the underlying action:

Jordan M. Heinz
KIRKLAND & ELLIS (IL)
300 North Lasalle
Chicago, IL 60654
312-862-2000
Email:Jheinz@kirkland.Com

Counsel for Plaintiffs

Chalia I. Stallings-Ala'ilima
OFFICE OF THE WASHINGTON ATTORNEY GENERAL
800 5th Ave, Ste 2000
Seattle, WA 98104-3188
206-464-7744
Email:Chalias@atg.Wa.Gov

Counsel for Plaintiff-Intervenor

A copy of the document above was also transmitted by email to additional counsel at the following addresses:

Vanessa Barsanti, vanessa.barsanti@kirkland.com
Mark Beckington, Mark.Beckington@doj.ca.gov
Ben Bistricher, Ben.Bistricher@lw.com
Lara Haddad, Lara.Haddad@doj.ca.gov
Mariaane F. Kies, MKies@cov.com
Peter Komorowski, PKomorowski@cov.com
Chloe Korban, Chloe.Korban@lw.com
Nicholas M. Lampros, nlampros@cov.com
Jennifer L. Levi, jlevi@glad.org
Amie Medley, Amie.Medley@doj.ca.gov
Colleen Melody, colleen.melody@atg.wa.gov
Matthew Miller, MMiller@foleyhoag.com
Shannon Minter, sminter@nclrights.org

Amy Quartarolo, amy.quartarolo@lw.com
Thomas E. Redburn, tredburn@lowenstein.com
Peter C. Renn, prenn@lambdalegal.org
Daniel I. Siegfried, daniel.siegfried@kirkland.com
Meg Slachetka, MSlachetka@lowenstein.com
Chris Stoll, CStoll@nclrights.org
Jason Sykes, jason@newmanlaw.com
Dixie Tauber, Dixie.Tauber@lw.com
Harrison White, harrison.white@lw.com

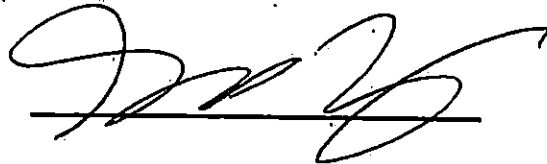
Dated: May 14, 2020

Respectfully submitted,

JOSEPH H. HUNT
Assistant Attorney General
Civil Division

ALEXANDER K. HAAS
Director, Federal Programs Branch

ANTHONY J. COPPOLINO
Deputy Director, Federal Programs
Branch

A handwritten signature in black ink, appearing to read 'Grace X. Zhou', written over a horizontal line.

GRACE X. ZHOU
(N.Y. Bar No. 5623681)
CHRISTOPHER D. EDELMAN
ANDREW E. CARMICHAEL
Trial Attorneys
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L Street, NW
Washington, DC 20005
Tel: (202) 616-8267
Email: grace.x.zhou@usdoj.gov